

EXHIBIT "A"**RICO STATEMENT****QUESTION #2**

DEFENDANT	MISCONDUCT	BASIS OF LIABILITY
Sami Omar Al-Hussayen	<p>Sami Omar Al-Hussayen, a citizen of Saudi Arabia, was admitted into the United States on an F-1 Student Visa for the purpose of pursuing his PhD. in computer science at the University of Idaho. On these applications, he failed to disclose that he would be providing business services and funding for numerous terrorist-affiliated charities and organizations.</p> <p>From at least October 2, 1998 until February 13, 2003 Al-Hussayen provided expert computer services, advice, assistance and support to terrorist-related organizations and individuals, in the form of web-site registration, management, administration and maintenance.</p> <p>Sami Al-Hussayen actively participated in the creation and design of these websites which entailed determining the inclusion and placement of various articles and images. Sami Al-Hussayen assisted the Islamic Assembly of North America (IANA) and numerous other groups in the maintenance of their sites.</p> <p>Al-Hussayen was the formal registered agent for IANA in Idaho, as well as for a number of other internet websites associated with or belonging to the organization. For each website, Al-Hussayen was responsible to the content provided to visitors.</p> <p>This content included the recruiting and mobilization of supporters to play a more active role in support of terrorist activities or causes, the direct promotion of violent <i>jihad</i> and directly support for Osama bin Ladin and al Qaida.</p> <p>He performed this service by disseminating fatwas, articles, images and other materials with the intention of recruiting supporters, sympathizers and members and to raise money for terrorist groups like al Qaida. He promoted fatwas by Sheik Alman Al-Ouda, Sheik Safar Al-Hawaly, the spiritual leaders of al Qaida, providing material support to the Enterprise by creating websites by which violent <i>jihad</i> against the United States could be espoused.</p>	1962(a) 1962(c) 1962(d)

	<p>On May 15, 2001, three and one-half months before the September 11th attacks, Al- Hussayen posted an article written by Sheik Ouda called "Suicide Operations" was posted on one of the affiliated websites for which he was responsible. The article advocated killing a great number of "enemies" through the suicidal takeover of an airplane and crashing it into an "important location" – "'The mujahid (warrior) must kill himself if he knows that this will lead to killing a great number of the enemies. In the new era, this can be accomplished with the modern means of bombing or bringing down an airplane on an important location that will cause the enemy great losses."</p> <p>Al Hussayen collected and forwarded jihadist audiotape messages from Osama bin Laden to fellow terrorist operatives with instructions to its recipients to send the messages out to as many people as possible. Thus, Al-Hussayen directly promoted and distributed messages from Osama bin Laden, as well as the suicide operations and the ideology espoused by Sheik Ouda.</p> <p>Al-Hussayen has also downloaded and distributed a speech given by Osama bin Laden with instructions that the speech be widely distributed. Consistent with this ideological support of Al Qaida, Al Hussayen created, registered and maintained numerous websites and Internet chat rooms which promote radical and violent jihad for the purpose of recruitment and raising funds to perpetuate the Al Qaida jihad.</p> <p>From November 1999 through February 13, 2003 Al-Hussayen was functioning as an IANA officer and employee. Al-Hussayen was actively involved in IANA's business transactions and fundraising activities, and helped direct money towards a number of so-called "charities" which were in fact part of the Enterprise. IANA was the only American Muslim organization to be individually promoted on the website of Azzam publications, widely considered to be the premier English-language mouthpiece of al Qaida.</p> <p>In addition to the messages and articles previously described, Al-Hussayen also maintained several disturbing images on his computer for use on these websites. Among the thousands of images were:</p> <ul style="list-style-type: none">• Several pictures of the World Trade Center Towers including	
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	<p>a computer generated image of where the airplanes struck the towers, and images of the towers before and after they collapsed;</p> <ul style="list-style-type: none"> • An aerial photograph of the Pentagon; • Photographs of other Al Qaida terrorist targets including the Golden Gate Bridge and the Capitol Building in Washington, DC; • Numerous photographs of Osama bin Laden including an image of Osama bin Laden facing off with President Bush. (There is a target superimposed on President Bush's head with the center of his head in the cross hairs of the target). • Photographs of Zacarias Moussaoui, the suspected 20th hijacker who has been indicted in Virginia and Richard Reid, the Al Qaida operative convicted of attempting to explode a trans-Atlantic flight from Paris to Miami with explosives inserted in his shoes; and • Photograph of a Taliban soldier firing a rocket propelled grenade. <p>Sami Al-Hussayen also provided material support to Al Qaida and other terrorist groups through the collection of donations. From August 1994 until at least February 2003, Sami Al-Hussayen maintained at least six different bank accounts in the United States. From at least 1997, Al-Hussayen used some of these accounts to receive donations and large sums of money. He transferred these sums to the IANA and other organizations and individuals. Sami Al-Hussayen also made disbursements to individuals in Cairo, Egypt; Montreal, Canada; Riyadh, Saudi Arabia; Amman, Jordan; and Islamabad, Pakistan.</p> <p>Mr. Al-Hussayen played an active role in determining where the IANA would send its contributions and how the business should operate in support of <i>jihad</i> and the Enterprise, including support for such organizations as "Help The Needy", whose website he also maintained, which illegally passed funds to Iraq in contravention of multiple executive orders.</p>	
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